



U.S. Department of Justice

United States Attorney
Southern District of New York

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

September 7, 2023

BY ECF

The Honorable Arun Subramanian
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Piaro, 23 Cr. 420 (AS)

Dear Judge Subramanian:

The Government respectfully submits this letter, with the defense's consent (1) requesting that the Court expressly order the bail conditions for the defendant set forth below; and (2) proposing the pretrial briefing schedule also set forth below.

I. The Defendant's Bail Conditions

The bail conditions set forth below were agreed-upon by the parties soon after the defendant's arrest and were ordered by a Magistrate Judge in the Eastern District of Wisconsin at or about the time of the defendant's presentment. The parties understand that the Court verbally adopted these conditions at the defendant's arraignment and initial pretrial conference on or about August 23, 2023, by indicating that the defendant's bail conditions would continue pending trial. (See Dkt. 8/23/2023 Min. Entry). However, the Government has communicated with the Magistrate Court Clerk's office in the Southern District of New York and understands that the clerk's office requires that the Court expressly list the bail conditions in writing.

Accordingly, the parties respectfully request that the Court formally so-order the following bail conditions for the defendant pending trial so that the Magistrate Clerk's Office can create the appropriate paperwork:

- Pretrial supervision.
- A \$2,000,000 personal recognizance bond, secured by two financial responsible persons as co-signors by September 1, 2023.
- The defendant must surrender to the pretrial services office any and all passports and travel documents, and may not submit any new applications for passports and/or travel documents.

- The defendant's travel is limited to: (i) the Eastern District of Wisconsin; (i) the Southern District of Ohio for legal visits, and the states and corresponding federal districts crossed when the defendant travels by car from the Eastern District of Wisconsin to the Southern District of Ohio for legal visits; and (iii) the Southern District of New York for court appearances, and the states and corresponding federal districts crossed when the defendant travels by car from the Eastern District of Wisconsin to the Southern District of New York for court appearances. The defendant must give his pretrial services officer a detailed itinerary prior to traveling outside of the Eastern District of Wisconsin as specified above and must contact his pretrial services officer within 24 hours of return to the Eastern District of Wisconsin.
- The defendant will not have any contact with any current or former call center employees, contractors, or vendors.
- The defendant will not have contact with any former employees, contractors, assistants, or accountants of any political action committees operated by or associated with the defendant.
- The defendant will not discuss this criminal matter outside of the presence of his counsel with any current employees, contractors, assistants, or accountants of any political action committees operated by or associated with the defendant.

II. Pretrial Motions Briefing Schedule

The defendant's pretrial motions are due by or before December 18, 2023. The parties jointly propose that the Government's opposition to the defendant's pretrial motions be filed by or before January 5, 2024, and that any defense reply be filed by or before January 12, 2024.

The bail conditions specified in this letter, as well as the parties' proposed briefing schedule for pretrial motions, are hereby adopted.

The Clerk of Court is directed to terminate the motion at ECF No. 18.

SO ORDERED.



Arun Subramanian, U.S.D.J.

Date: September 7, 2023

cc: Defense Counsel (by ECF)

Respectfully submitted,

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United States Attorney

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